

REMARKS

This application has been reviewed in light of the Office Action dated December 27, 2007, made final by the Examiner. Claims 1, 4-6, and 9-26 are now pending in the application. Claim 1 has been amended for clarification. No new matter has been added. Claims 7 and 8 have been cancelled without prejudice. Claims 17-26 have been added. No new matter has been introduced. Applicant reserves the right to pursue claims 7 and 8 by way of a separate divisional application. The Examiner's reconsideration of the rejection in view of the following remarks is respectfully requested.

By the Office Action, claims 1, 4-6 and 9-16 stand rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. Claim 1 has been amended in a way believed to overcome the rejection. Reconsideration is respectfully requested.

By the Office Action, claims 1, 4-6 and 9-16 stand rejected under 35 U.S.C. §112, second paragraph as being indefinite. Regarding claim 1, the Examiner stated that it is unclear if the weight percent of the binder is for the coating with solvent prior to drying or the dried coating. It is respectfully submitted that the clarifying amendment makes this rejection moot. The polymer of the binder is at least 30% and therefore it is irrelevant whether the coating is dried or wet. Reconsideration of the rejection is respectfully requested.

Regarding claim 10 (and claim 5), the Examiner stated that "of normally incident back light thereon" is unclear. The Applicant respectfully disagrees. Light incident on the coating in a normal direction (perpendicular to the surface) is transmitted at a certain percentage. One skilled in the art would understand this without ambiguity. Reconsideration of the rejection is earnestly solicited.

EXAMINER'S RESPONSE TO ARGUMENTS:

Applicant notes with appreciation the insightful Examiner's responses. The Examiner states that the reflective properties of a coating are from particles in the coating not from the binder. However, the aging of the binder due to discoloration affects the light properties of the coating. The present invention addresses this problem by providing a binder and application method that improves the quality of the coating over time to prevent these discoloration effects. None of the cited references provide any recognition of this problem, let alone any solutions for addressing this issue. Please consider the following amendments and remarks.

By the Office Action, claims 1, 4, 5, 14 and 16 stand rejected under 35 U.S.C. §103(a) as being obvious in view of by U.S. Patent Publication No. 2001/0040809 to Sools et al. (hereinafter Sools).

The Applicant respectfully disagrees with the rejection.

The Examiner stated that Sools includes a binder that could be a fluoropolymer which could meet the structural formula recited in claim 1. The Examiner stated that Sools teaches that the light reflecting particles are in a comparatively low percentage by volume with respect to the binder and that the at least 30% language of claim 1 is met. The Applicants respectfully disagree. Claim 1 has been amended to further clarify the differences between Sools and the present claims.

Claim 1, now recites the coating comprising a binder including at least 30% by weight of a polymer having the following structural formula... wherein the polymer of the binder having the structural formula is cross-linked and includes resistance to ultraviolet light and temperature while maintaining a reduced absorption rate to prevent discoloration of the coating.

The coating of Sools includes a cyclohexane solvent and a silicone binder and is silent as to the use of a water based solvent for coatings (see Sools at page 2 paragraph [0019]). The binder provides a substrate for which reflective particles are dispersed with a higher concentration toward

one side of the coating than the other. Sools attempts to trap light in the layer in a light-guiding/reflective layer [0018]. Nowhere in Sools is a binder including at least 30% by weight of a polymer having the [given] structural formula... wherein the polymer of the binder having the structural formula is cross-linked and includes resistance to ultraviolet light and temperature while maintaining a reduced absorbtion rate to prevent discoloration of the coating disclosed or suggested. There is no indication in Sools that a coating be formed to prevent discoloration over time or provide a given weight percent or such a material to provide this feature.

While paragraph [0011] of Sools mentions the possibility of a flouropolymer binder, there is no teaching of a binder including at least 30% by weight of a polymer having the [given] structural formula. In addition, there is no teaching of the polymer is cross-linked and includes resistance to ultraviolet light and temperature while maintaining a reduced absorbtion rate to prevent discoloration of the coating.

Sools does not identify the discoloration or aging problems addressed in accordance with the present invention. Claim 1 has been amended to explicitly provide these elements to the claim. It is therefore respectfully submitted that claim 1 is allowable over Sools. For at least the reasons stated. Reconsideration is respectfully requested.

Method claims 17-26 have been added to address the Examiner's statement that the choice the water solvent is a process step. Consideration of these claims is respectfully requested.

It is noted that Sools is commonly assigned with the present disclosure. The Examiner's earlier comment on this is acknowledged. However, should the Examiner reconsider an obvious-type double-patenting rejection, the Applicant would consider a terminal disclaimer.

By the Office Action, claims 1, 6, and 9-14 stand rejected under 35 U.S.C. §103 as being obvious in view of by U.S. Patent No. 3,306,956 to Barnette (hereinafter Barnette).

The Applicant respectfully disagrees with the rejection.

Barnette is directed to a system where decorative patterns are provided on light transmissive panels. The patterned layers are concerned with transmissive properties of the materials employed, and are contemplated for stained glass or window-like applications. The Examiner states that the compositions taught by Barnette meet the currently presented claims. It is respectfully submitted that the Barnette fails to disclose or suggest at least: a diffuse reflective coating that is provided on an inner side of said housing, the diffuse reflective coating having: a binder including at least 30% by weight of a polymer having the [given] structural formula... wherein the polymer of the binder having the structural formula is cross-linked and includes resistance to ultraviolet light and temperature while maintaining a reduced absorbtion rate to prevent discoloration of the coating.

As described above, the beneficial effects provided by the present invention are realized through at least 30% by weight of a polymer in a binder, such structure includes resistance to ultraviolet light and temperature while maintaining a reduced absorbtion rate to prevent discoloration of the coating. Barnette does not disclose or suggest these features, and fails to identify the problems or the structure presently recited by at least claim 1. For example, Barnette is directed to transmissive sheets that permit light to pass through. (See col. 11, lines 26-53, which were cited by the Examiner, “light transmitting film 10”, etc.) A diffuse reflective coating provided on an inner side of the housing with the features as set forth in claim 1 are not disclosed or suggested by Barnette. In fact, one skilled in the art with knowledge would not look to Barnette to solve the problems addressed by the present invention, namely discoloration and aging effects, for example.

Barnette focuses on translucent or opaque patterns with jewel-like transmissive properties, creases, non-conformities, etc. to alter the transmission of light into a desired pattern. Barnette makes decorative panels and does not disclose or suggest the present structure or solutions provided in accordance with the present claims.

Barnette does not disclose a diffuse reflective coating used on an inner surface of a housing

including a water based solvent and a binder as set forth in claim 1. Barnette fails to disclose or suggest at least: a binder including at least 30% by weight of a polymer having the [given] structural formula... wherein the polymer of the binder having the structural formula is cross-linked and includes resistance to ultraviolet light and temperature while maintaining a reduced absorbtion rate to prevent discoloration of the coating. Barnette therefore does not disclose or suggest the present invention as claimed, nor does Barnette render the present claims obvious based on its teachings. Reconsideration of the rejection is respectfully requested.

By the Office Action, claims 1, 4, 5, 14 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sools in view of U.S. Patent No. 4,141,873 to Dohany (hereinafter Dohany).

The Applicant respectfully disagrees with the rejection.

The Examiner cites Dohany to cure the deficiencies of Sools. While Dohany teaches the implementation of a water based vinylidene fluoride/acrylate coating, the coating is formed as a protective coating to provide, e.g., solvent or chemical resistance, etc. The optical properties (reflective properties) of such a coating are not disclosed or suggested, nor are such properties of concern in Dohany. This structure of Dohany does not provide any motivation to combine the reference with Sools to arrive at the present invention. The Examiner states that given the teachings of Sools, one skilled in the art would look to Dohany to find the appropriate solvent (water) for the fluoropolymer binder of Sools.

As mentioned previously, Sools is not looking for a protective coating and Dohany is not trying to provide preferable reflective light properties. Sools does not provide any motivation to use the monomer of Dohany, nor does Sools teach or suggest using a water based solvent coating to solve the aging and coloration issues addressed in the present disclosure. Neither reference provides proper motivation to combine it with the other.

It is therefore respectfully submitted that the cited combination fails since at least proper motivation to combine the references is not provided. Even if, *arguendo*, Sools and Dohany are combined, the combination fails to disclose or suggest all of the elements recited in amended claim 1. For example, the cited combination fails to disclose or suggest at least: a binder including at least 30% by weight of a polymer having the [given] structural formula... wherein the polymer of the binder having the structural formula is cross-linked and includes resistance to ultraviolet light and temperature while maintaining a reduced absorbtion rate to prevent discoloration of the coating. Reconsideration of the rejection is earnestly solicited.

By the Office Action, claims 15 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Barnette in view of U.S. Patent No. 6,057,961 to Allen (hereinafter Allen).

As set forth above, claim 1 is believed to be in condition for allowance. Therefore, claims 15 and 16 are also believed to be in condition for allowance due at least to their dependency from claim 1. These and other dependent claims are believed to be allowable for other reasons as well.

In view of the foregoing amendments and remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

It is believed that no additional fees or charges are currently due. However, in the event that any additional fees or charges are required at this time in connection with the application, they may be charged to applicant's representatives Deposit Account No. 14-1270.

Respectfully submitted,

Dated: _____

By: _____
James J. Bitetto
Reg. No. 40,513

Dated: February 20, 2008

By: /Frank J. Keegan/
Frank J. Keegan
Reg. No. 50,145

Correspondence Address:

**Philips Intellectual Property & Standards
P.O. Box 3001
Briarcliff Manor, NY 10510**